UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CITILINE HOLDINGS, INC., Individually and On Behalf of All Others Similarly Situated,:

Plaintiff,

Vs.

LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF SETTLEMENT AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS, AND AWARD OF

ATTORNEYS' FEES AND EXPENSES

PLEASE TAKE NOTICE that upon: (i) the Declaration of Robert M. Rothman affirmed on March 1, 2013; (ii) the Declaration of Samuel H. Rudman affirmed on March 1, 2013, (iii) the Declaration of Jack G. Fruchter affirmed on February 26, 2013, (iv) the Settlement Agreement dated September 5, 2012 and the Exhibits annexed thereto, (v) Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds, (vi) Co-Lead Counsel's Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses, and (vii) all other proceedings herein, Lead Plaintiffs will move this Court, before the Honorable Richard J. Sullivan, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on April 5, 2013, at 11:30 a.m., for entry of orders and judgments pursuant to Rule 23 of the Federal

Rules of Civil Procedure (1) finally approving the settlement of the captioned litigation, (2) approving the Plan of Allocation of settlement proceeds, and (3) awarding Co-Lead Counsel attorneys' fees of 30% of the Settlement Fund, plus expenses and charges in the litigation.

DATED: March 1, 2013

Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN ROBERT M. ROTHMAN

s/ Samuel H. Rudman SAMUEL H. RUDMAN

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Co-Lead Counsel for Plaintiffs

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Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2013, I authorized the electronic filing of the foregoing with

the Clerk of the Court using the CM/ECF system which will send notification of such filing to the

e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I

caused to be mailed the foregoing document or paper via the United States Postal Service to the non-

CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on March 1, 2013.

s/ Samuel H. Rudman

SAMUEL H. RUDMAN

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Manual Notice List

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